

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :
: CASE NO. 1:00-CR-119-03
v. :
: (Judge Kane)
JOHN WATSON, :
Petitioner : (Electronically Filed)

**UNOPPOSED MOTION FOR CONTINUANCE
OF HEARING SET FOR DECEMBER 15, 2004**

NOW COMES the petitioner, John Watson, by and through his attorney, Anser Ahmad, Esq., with this *Unopposed Motion for Continuance of Hearing Set for December 15, 2004* and in support thereof avers as follows:

1. A hearing in this matter is currently set for December 15, 2004 at 1:30 p.m. on Petitioner's second amended petition for writ of habeas corpus.
2. Undersigned counsel is scheduled to appear before the Executive Office for Immigration Review (hereinafter referred to as "EOIR", ie. Immigration Court) in Elizabeth, New Jersey for the matter of *Silla Daouda*, A96-208-809 on December 15, 2004 at 2:00 p.m.
3. The *Daouda* hearing was scheduled on November 12, 2004, at which time undersigned counsel was informed that no continuances would be granted.
4. As it would be impossible for undersigned counsel to appear before this Honorable Court at 1:30 and the EOIR Court in New Jersey at 2:00 p.m., and given that the *Daouda* hearing cannot be rescheduled, it is requested that the

hearing in the instant matter be continued to a date that is most convenient for this Honorable Court.

5. Undersigned counsel is available on the following dates in January 2005: January 3, 6, 7, 12, 14, 17-19, 21, 27, 28, 2005.
6. William A. Behe, Assistant U.S. Attorney, has been contacted regarding this request by undersigned counsel's office and concurs with the request for a continuance.
7. Petitioner will be severely prejudiced should this motion be denied.
8. The Government will not be similarly prejudiced should this motion be granted.

WHEREFORE, it is respectfully requested that this Honorable Court grant a continuance of the hearing set for December 15, 2004 and reschedule the hearing to a date that is most convenient to the Court.

Respectfully submitted,

/s/ Anser Ahmad

Anser Ahmad, Esq.
PA I.D. No. 75008
AHMAD LAW OFFICES, P.C.
105 N. Front Street, Suite 106
Harrisburg, PA 17101-1436
(717) 920-9100

Dated: December 8, 2004

Attorney for Petitioner

CERTIFICATE OF SERVICE

I, Paula R. Walter, Paralegal, hereby certify that I have, on this date, served a copy of the foregoing *Unopposed Motion for Continuance of Hearing Set for December 15, 2004* and all attached pages upon the person(s) and in the manner indicated below:

William A. Behe
Assistant U.S. Attorney
228 Walnut Street
P.O. Box 11754
Harrisburg, PA 17108

Service by First Class Mail, postage prepaid to the above-named person(s).

/s/ Paula R. Walter
Paula R. Walter, Paralegal
AHMAD LAW OFFICES, P.C.
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Harrisburg, PA 17101-1436
(717) 920-9100

Dated: December 8, 2004